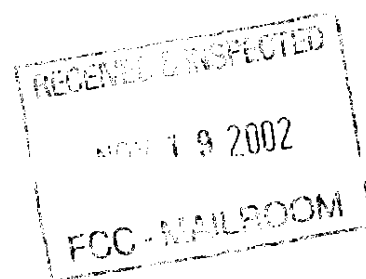




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November 13, 2002

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: CG Docket No. 02-278

TeleSTAR Marketing, L.P. is an outbound telemarketing business, employing over 400 people in offices located in Media, Lancaster and Reading, Pennsylvania.

The following are comments relating to the FTC and FCC's attempt to further regulate the Telemarketing Industry:

Do-Not-Call Lists

The current Federal Law, regarding do-not-call, is company specific and currently serves the needs of the telemarketing industry. We do not want to contact people who do not want to be called by a specific company. To establish a carte blanche approach, which prohibits any calling, is not in the best interests of the consumer or our industry. Blanket lists simply deprive the consumer of choice.

Ninety nine percent of TeleSTAR Marketing calling is for Cable TV companies, where we offer and educate existing customers on a number of programming specials, as well as new products i.e. internet and digital services. The marketing of these latter two services has been very successful. We have been able to not only tell customers of their availability, but also answer numerous questions that they raise.

Consideration should also be given to the fact that limiting the number of consumers telemarketers can contact will have a ripple effect on companies who rely on the telephone to sell their goods and services. The overall economic impact should be seriously considered before tightening restrictions.

In addition, our industry already must comply with state run do-not-call legislation which thankfully, in large part, exempts calls to consumers when the company has an established business relationship, non-profit organizations, surveys, etc.

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Telemarketing Disclosures

Announcing the name of the person making the call and the company they are calling for is perfectly acceptable and is good business. If for some reason the called person wants further information i.e. the name of the telemarketing company making the call, the address or telephone number, etc. this should be provided without question. Legislation that demands other disclosures, at the beginning of the call, only serves to increase the amount of time spent per call and reduces efficiency and increases costs to the company paying for the call.

Predictive Dialers

Predictive dialers make our industry efficient and a cost effective way businesses can market their products and services. It is possible to abuse acceptable efficiency by setting the abandonment rate too high and perhaps a level which should not be exceeded should be set. TeleSTAR Marketing has always set the rate at 3% and a rate of 3-5% would probably be effective.

Calling Hours

The present Federal Law, prohibiting calling after 9:00pm and before 8:00am is acceptable. No one can accurately determine when people eat dinner, and ruling out any hours which are thought to be the "correct" dinner time is not in the best interests of anyone.

Summary

The Telemarketing Industry has come under much scrutiny because of fraudulent operators and the increased frequency of calling. The former has been dealt with by tougher legislation, all supported by legitimate telemarketers. The frequency issue is another matter. Why has the use of telemarketing grown? The answer is simple – telemarketing works and is a cost effective way to market products and services. Millions of jobs are created and employment is sustained not only in the telemarketing industry but in those companies using this marketing tactic.

Unfortunately, with all the recent State legislation many telemarketing vendors have left US borders and have located elsewhere i.e. Canada, India, United Kingdom, France, Germany and the Caribbean to name a few. I do not think the purpose of the FCC or FTC is to compound this exodus with more legislation, but the result may just do that.

There are a multitude of ways to limit unwanted calls in the form of answering machines, caller ID, prerecorded messages and the current company specific do-not-call lists. It is time for someone in Government to stand up and speak about the possible pit falls of such additional legislation which will cause irrevocable damage to the economy and increase the unemployment numbers to staggering levels.

I urge the FCC to consider these objections, realize what is really at stake and not make a purely political decision, that on the surface, may seem to be one consumers really want.

Submitted by:

A handwritten signature in black ink, appearing to read "Arthur H. Saxon". The signature is fluid and cursive, with the first name "Arthur" being more legible than the last name "Saxon".

Arthur H. Saxon
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